

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

v.

Matthew Goulet *et al.*,
Defendants

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Civil No. 15-cv-00280-PB

AFFIDAVIT OF CYNTHIA DOMENICI

I, Cynthia Domenici, upon oath do hereby depose and state as follows:

1. I am a Registered nurse coordinator and case manager for the New Hampshire Department of Corrections. I have held this position for 13 years. I have also worked as a staff/floor nurse for the NH Department of corrections prior to becoming a Nurse Coordinator.

2. As a nurse coordinator and case manager my job duties are to manage complicated cases, medical paroles, Nurse coordinator coverage, review and write PPD' and guidelines among other miscellaneous nursing duties.

3. I recall Mr. Jonathan Leite's incident on 8-24-2012 in the Northern New Hampshire Correctional Facility and his recovery admission to the NHSP Infirmary.

4. I have reviewed Mr. Leite's medical file, which includes notes of the nurse who treated him on the evening of August 24, 2012. Unfortunately, this nurse, Donna Edwards, has since passed away.

5. Attached as Exhibit J-1 to this is a true and accurate copy of the nursing notes pertaining to Mr. Leite from August 24, 2012.

6. These notes reflect that the treating nurse found there to be “no open areas[,] no abrasions or signs of assault.”

7. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 10, 2017

s/Cynthia Domenici
Cynthia Domenici